

1 Anna Y. Park, SBN 164242  
2 anna.park@eeoc.gov  
3 Nakkisa Akhavan, SBN 236260  
nakkisa.akhavan@eeoc.gov  
4 Taylor Markey, CA SBN 319557  
taylor.markey@eeoc.gov  
5 Andrea E. Ringer, SBN 307315  
andrea.ringer@eeoc.gov  
6 Derek Li, SBN 150122  
derek.li@eeoc.gov  
7 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
8 255 East Temple Street, Fourth Floor  
Los Angeles, CA 90012  
9 Telephone: 213-785-3080  
Facsimile: (213) 894-1301  
10

11 *Attorneys for Plaintiff*  
12 U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION  
13

14 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

15 U.S. EQUAL EMPLOYMENT  
16 OPPORTUNITY COMMISSION,  
17

Plaintiff,

18 vs.  
19

20 LUCINDA MANAGEMENT, LLC,  
CENTENNIAL FOOD CORPORATION dba  
21 IHOP RESTAURANT, NELLIS FOOD  
CORPORATION dba IHOP RESTAURANT,  
VEGAS FOOD CORPORATION dba IHOP  
22 RESTAURANT, CHEYENNE FOOD  
CORPORATION dba IHOP RESTAURANT,  
CRAIG FOOD CORPORATION dba IHOP  
23 RESTAURANT, BAYSHORE FOOD  
CORPORATION dba IHOP RESTAURANT,  
DiHOP CORPORATION dba IHOP  
24 RESTAURANT, COOPER STREET CLAM  
25 & OYSTER BAR, LLC, and Does 1-5  
Inclusive,  
26 Defendants.

27 Case No.: 2:17-cv-02458-MMD-EJY  
28

**JOINT STIPULATION TO EXTEND THE  
TERM OF THE CONSENT DECREE  
FROM AUGUST 18, 2024 TO AUGUST 28,  
2024**

1 **TO THE HONORABLE MIRANDA M. DU:**

2 Plaintiff United States Equal Employment Opportunity Commission (“EEOC”) and  
3 Lucinda Management, LLC, Centennial Food Corporation dba IHOP Restaurant, Nellis Food  
4 Corporation dba IHOP Restaurant, Vegas Food Corporation dba IHOP Restaurant, Cheyenne  
5 Food Corporation dba IHOP Restaurant, Craig Food Corporation dba IHOP Restaurant,  
6 Bayshore Food Corporation dba IHOP Restaurant, DiHOP Corporation dba IHOP Restaurant,  
7 Cooper Street Clam & Oyster Bar, LLC (“Defendants”) (collectively, the “Parties”) hereby  
8 jointly stipulate to extend the term of the Consent Decree in the above-captioned case for ten  
9 (10) days, from August 18, 2024, the current end of the term of the Decree, until August 28,  
10 2024 to allow the Parties to negotiate a stipulation to extend certain requirements of the Consent  
11 Decree.

12 Pursuant to Section V1.A of the Consent Decree, signed by this Court on February 19,  
13 2019, the terms of the Consent Decree may be amended or modified by a mutual written and  
14 signed agreement and the approval of this Court. Under Section IV.B, this Court retains  
15 jurisdiction over this matter for the purposes of entering all orders, judgments and decrees that  
16 may be necessary to implement the relief provided for in the Consent Decree.

17 The Parties have agreed in principle to a stipulation to extend certain provisions of the  
18 Consent Decree related to monitoring and reporting of equal opportunity employment complaints  
19 and Defendant’s investigations. The Parties require more time to negotiate the terms of the  
20 extension of the Consent Decree. As such, the parties hereby stipulate, and respectfully request  
21 that the Court approve the stipulation that the Consent Decree term be extended until August 28,  
22 2024, to permit the Parties to file a further Joint Stipulation to extend the Consent Decree.

23 **IT IS SO STIPULATED.**

24  
25 Respectfully Submitted,

26  
27 U.S. EQUAL EMPLOYMENT  
28 OPPORTUNITY COMMISSION

Date: August 19, 2024

/s/ Taylor Markey

1 By: Taylor Markey  
2 Attorney for Plaintiff, EEOC  
3  
4

5 FISHER PHILLIPS LLP  
6

7 Date: August 19, 2024  
8

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By: /s/ Mark J. Ricciardi, Esq.  
Attorney for Defendants

10 IT IS SO ORDERED.  
11  
12

13   
14 THE HONORABLE MIRANDA M. DU  
15 UNITED STATES DISTRICT JUDGE  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

20 DATED: August 20, 2024